

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION

FILED
RICHARD W. HADJIL
CLERK OF COURT
2019 MAR 12 PM 3:20

UNITED STATES OF AMERICA,

Plaintiff,

vs.

TINA IMES,

Defendant.

CASE NO. **2:19-cr-00060**

JUDGE **Judge Watson**

INFORMATION

18 U.S.C. § 371
18 U.S.C. § 2322
42 U.S.C. § 7413(c)(1)
18 U.S.C. § 1071

UNDER SEAL

THE UNITED STATES ATTORNEY CHARGES:

COUNT 1

(Conspiracy to Operate a Chop Shop and to Violate the Clean Air Act)

1. From on or about January 20, 2013, through on or about April 6, 2014, in the Southern District of Ohio, and elsewhere, the defendant, **TINA IMES**, and other co-conspirators did knowingly, intentionally, and willfully combine, conspire, and confederate and did agree to:

- a. knowingly and unlawfully own, operate, and maintain a chop shop in metropolitan Columbus, Ohio, as defined in Title 18, United States Code, Section 2332(b), in violation of 18 U.S.C. §§ 2322 and 2.
- b. knowingly cause and assist in causing the venting, release, and disposal of Class II substances that entered the environment during the course of operating the chop shop in violation of 42 U.S.C. § 7413(c)(1) and 18 U.S.C. § 2.

Manner and Means of the Conspiracy

2. It was a part of the conspiracy that co-conspirators stole vehicles throughout metropolitan Columbus, Ohio so that parts from the vehicles could be sold for profit via the operation of a chop shop.
3. It was a part of the conspiracy that co-conspirators disposed of appliances and parts contained in motor vehicles which knowingly caused the release and venting of refrigerants into the environment.

Overt Acts

4. From on or about March 27, 2014, through on or about April 6, 2014, in the Southern District of Ohio, and elsewhere, the defendant, **TINA IMES** assisted in the theft, unlawful possession and trafficking in parts of a motor vehicle, to wit, a 2003 Dodge Ram 2500, vehicle identification number 3d7ku28d63g713491.
5. From on or about January 20, 2013, through on or about April 6, 2014, **TINA IMES** was aware of, and assisted in causing the venting, release, and disposal of Class II substances into the atmosphere during the operation of the chop shop, including the cutting of tubing by a co-conspirator from at least one (1) motor vehicle air conditioner, causing the refrigerant HCFC-22 in the air conditioner to be vented into the atmosphere.

All in violation of 18 U.S.C. § 371.

COUNT 2
(Concealing Person From Arrest)

From on or about October 18, 2018 to on or about November 9, 2018, in the Southern District of Ohio, the defendant, **TINA IMES**, harbored and concealed James A. Imes, a person for whose arrest a warrant and process had been issued under the provisions of a law of the United States, so as to prevent the discovery and arrest of James A. Imes, after notice and knowledge of the fact that a warrant and process had been issued for the apprehension of James A. Imes, and which warrant had been issued on a felony charge.

In violation of 18 U.S.C. § 1071.

BENJAMIN C. GLASSMAN
UNITED STATES ATTORNEY



J. MICHAEL MAROUS, (0015322)
Assistant United States Attorney



JONATHAN J.C. GREY, (IL 62929180)
Assistant United States Attorney